

## **EXHIBIT 4**

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FILE NO: 59498.338

**Via E-Mail**

Javier H. Rubenstein  
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Re: *In re Application of Antonio Del Valle Ruiz et al*, No. 1:18-mc-00085-ER (S.D.N.Y.)

Dear Javier:

I am writing in response to your letter dated April 23, 2018 concerning the confidentiality restrictions identified in Respondents' Memorandum in Opposition to the Petitioners' Section 1782 Petition. As explained in the Opposition, disclosing confidential information to the Petitioners would violate EU law. Accordingly, without prior authorization from the General Court, a protective order would not overcome the confidentiality restrictions.

In addition, you proposed to meet and confer to address the arguments raised in the Opposition concerning the burden and intrusiveness of the discovery that the Petitioners seek. It is premature to meet and confer because the Court has not granted the Application. In the event that the Court permitted discovery to proceed, we would then consider scheduling a time to meet and confer.

Very truly yours,



Samuel A. Danon